

EXHIBIT 23

Elizabeth L. Deeley (SBN 230798)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
E-mail: elizabeth.deeley@kirkland.com

Andrew A. Kassof, P.C. (*pro hac vice* forthcoming)
Brenton Rogers (*pro hac vice* forthcoming)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
E-mail: andrew.kassof@kirkland.com
E-mail: brenton.rogers@kirkland.com

*Attorneys for Defendants Rio Tinto Minerals Inc.
and Rio Tinto Services Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

THE CITY OF IMPERIAL BEACH,
INDIVIDUALLY AND ON BEHALF OF THE
PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

V.

CHEVRON CORP., et al.

Defendants.

CASE NO. 4:17-cv-04934-PJH

DEFENDANTS RIO TINTO MINERALS INC. AND RIO TINTO SERVICES INC.'S RULE 7.1 DISCLOSURE STATEMENT

[Removal from the Superior Court of the State of California, County of Contra Costa, Case No. C17-01227]

Action Filed: July 17, 2017

1 TO THE COURT CLERK AND ALL PARTIES OF RECORD¹:

2 Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Rio Tinto Minerals
3 Inc. ("Rio Tinto Minerals") states the following:

- 4 1. Rio Tinto Minerals is a wholly-owned subsidiary of Rio Tinto America Inc.
- 5 2. Rio Tinto America, Inc. is a wholly-owned subsidiary of Rio Tinto America Holdings
6 Inc.
- 7 3. Rio Tinto America Holdings Inc. is a wholly-owned subsidiary of Rio Tinto Western
8 Holdings Limited.
- 9 4. Rio Tinto Western Holdings Limited is a wholly-owned subsidiary of Rio Tinto
10 European Holdings Limited.
- 11 5. Rio Tinto European Holdings Limited is a wholly-owned subsidiary of Rio Tinto plc.
- 12 6. Rio Tinto plc is a publicly held corporation that indirectly holds more than 10% of Rio
13 Tinto Minerals.

14

15 Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Rio Tinto Services
16 Inc. ("Rio Tinto Services") states the following:

- 17 1. Rio Tinto Services is a wholly-owned subsidiary of Rio Tinto America Inc.
- 18 2. Rio Tinto America Inc. is a wholly-owned subsidiary of Rio Tinto America Holdings
19 Inc.
- 20 3. Rio Tinto America Holdings Inc. is a wholly-owned subsidiary of Rio Tinto Western
21 Holdings Limited.
- 22 4. Rio Tinto Western Holdings Limited is a wholly-owned subsidiary of Rio Tinto
23 European Holdings Limited.
- 24 5. Rio Tinto European Holdings Limited is a wholly-owned subsidiary of Rio Tinto plc.

25

26

27 ¹ This disclosure statement is filed solely for purposes of complying with the Federal Rules of
28 Civil Procedure, and is not intended to operate as an admission of any factual allegation or legal
conclusion, and is further submitted subject to, and without waiver of, any defense, affirmative
defense, or objection, including personal jurisdiction.

6. Rio Tinto plc is a publicly held corporation that indirectly holds more than 10% of Rio Tinto Services.

DATED: September 6, 2017

/s/ Elizabeth L. Deeley

Elizabeth L. Deeley (SBN 230798)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
E-mail: elizabeth.deeley@kirkland.com

Andrew A. Kassof, P.C. (*pro hac vice* forthcoming)
Brenton Rogers (*pro hac vice* forthcoming)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
E-mail: andrew.kassof@kirkland.com
E-mail: brenton.rogers@kirkland.com

*Attorneys for Defendants Rio Tinto Minerals Inc.,
and Rio Tinto Services Inc.*

CERTIFICATE OF SERVICE

On September 6, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all persons registered for ECF. All copies of documents required to be served by Fed. R. Civ. P. 5(a) and L.R. 5-1 have been so served.

/s/ Elizabeth L. Deeley

Elizabeth L. Deeley (SBN 230798)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
E-mail: elizabeth.deeley@kirkland.com